



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("The Department") pursuant to its authority under M.G.L. c. 111, §142B and §142D, 310 CMR 7.00 et seq., and in accordance with the provisions of 310 CMR 7.00: Appendix C.

ISSUED TO ["the Permittee"]:

Seaman Paper Company of Massachusetts, Inc.

FACILITY LOCATION:

Seaman Paper Company
51 Main Street
Otter River, MA 01436

NATURE OF BUSINESS:

Paper Mill

RESPONSIBLE OFFICIAL:

Name: George Jones III
Title: President
Phone: (978) 939-2146

INFORMATION RELIED UPON:

Transmittal No. W044877, W081179,
& W083986
Minor Modification Tr. #W226617

FACILITY IDENTIFYING NUMBERS:

AQ ID: 118-0035
FMF FAC NO. 138896
FMF RO NO. 161302

STANDARD INDUSTRIAL CODE (SIC):

2621

FACILITY CONTACT PERSON:

Same

This operating permit shall expire on September 8, 2013.

For the Department of Environmental Protection, Bureau of Waste Prevention

Thomas P Cusson
Section Chief, Bureau of Waste Prevention

November 25, 2008
date



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SPECIAL CONDITIONS FOR OPERATING PERMIT

A Legend to Abbreviated Terms found in the following Tables is located in Section 28 of the Operating Permit.

1. PERMITTED ACTIVITIES

In accordance with the provisions of 310 CMR 7.00:Appendix C and applicable rules and regulations, the Permittee is authorized to operate air emission units as shown in Table 1 and exempt, and insignificant activities as described in 310 CMR 7.00:Appendix C(5)(h) and (i). The units described in Table 1 are subject to the terms and conditions shown in Sections 4, 5, and 6 and to other terms and conditions as specified in this permit. Emissions from the exempt activities shall be included in the total facility emissions for the emission-based portion of the fee calculation described in 310 CMR 4.00 and this permit.

DESCRIPTION OF FACILITY AND OPERATIONS

Seaman Paper is a non-integrated paper mill producing lightweight specialty papers on two Fourdrinier paper machines. The products include wrapping tissue, wax-coated bakery tissues, decorative crepe paper and flat tissue specialties. The facility is located off Main Street along the bank of the Otter River in Templeton, Massachusetts. Raw materials used by the facility consist of water, virgin paper fiber and recycled paper fiber. Four on-site boilers presently provide the thermal demands of the facility. The Bigelow and B&W boilers are fired by No.6 oil with a sulfur content not in excess of 1.0 percent by weight. The two Hurst boilers burn wood fuel and are subject to CAM requirements for particulate matter.

The exhaust gas from the boilers contains regulated air pollutants. Also small amounts of VOC used as additives in the paper making chemicals are emitted from the paper making machines. The facility is not a major source of HAPs.

Table 1 lists the equipment (emission units or EUs) subject to this Operating Permit. Table 2 describes the exempt activities that are not mentioned further in the Operating Permit. Tables 3, 4, 5, and 6 describe the applicable requirements that the EUs are subject to in the Operating Permit.

2. EMISSION UNIT IDENTIFICATION

The following emission units (Table 1) are subject to and regulated by this operating permit:

Table 1			
Emission Unit (EU#)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
2	Bigelow Type A boiler	49,400,000 BTU per hour	N/A
3	B&W FM-370 boiler	32,500,000 BTU per hour	N/A
4	Hurst Wood Fired Boiler	29,880,000 BTU per hour	Flue Gas Recirculation and Multiclone/Fabric Filter Collector
5	Hurst Wood Fired Boiler	29,880,000 BTU per hour	Flue Gas Recirculation and Multiclone/Fabric Filter Collector

3. IDENTIFICATION OF EXEMPT ACTIVITIES

The following are considered exempt activities in accordance with the criteria contained in 310 CMR 7.00: Appendix C(5)(h):

Table 2	
Description of Current Exempt Activities	Reason
The list of current exempt activities is contained in the Operating Permit application and shall be updated by the Permittee to reflect changes at the facility over the permit term. An up-to-date copy of exempt activities list shall be kept on-site at the facility and a copy shall be submitted to the Department's Regional Office. Emissions from these activities shall be reported on the annual emissions statement pursuant to 310 CMR 7.12.	310 CMR 7.00:Appendix C(5)(h)

4. APPLICABLE REQUIREMENTS

A. EMISSION LIMITS AND RESTRICTIONS

The permittee is subject to the emission limits/restrictions as contained in Table 3 below:

Table 3					
EU #	Fuel or Raw Material	Pollutant	Emissions Limit/Standard	Restrictions	Applicable Regulation and/or (Approval No.)
2 and 3	#6 Fuel Oil	PM	0.10 lb/MMBtu and 6.3 lb/hr (Footnote 1)	Fuel oil sulfur content not to exceed 0.55 lb/MMBtu.	310 CMR 7.05 (1) Approval #W221007 dated April 30, 2008. Approval #C-B-90-011.
		SO ₂	1.05 lb/MMBtu and 65.9 lb/hr		
		NO _x	0.37 lb/MMBtu and 23.1 lb/hr		
		CO	0.03 lb/MMBtu and 2.1 lb/hr		
		VOC	0.002 lb/MMBtu and 0.12 lb/hr		
		Opacity	≤ 15% during normal operation based on a six-minute block average. ≤ 27% during Startup, Shutdown, Burner Shutdown/Change and Soot Blowing based on a six-minute block average. Never to exceed 27% based on a six-minute block average.	The Permittee shall conduct soot blowing in each boiler every four hours of boiler operation.	POGOP Approval dated October 8, 2004 and 310 CMR 7.06(1)(c)

Table 3

EU #	Fuel or Raw Material	Pollutant	Emissions Limit/Standard	Restrictions	Applicable Regulation and/or (Approval No.)
4 & 5	Wood	PM	0.010 lb/MMBtu, 0.30 lb/hr, 1.3 tons per rolling twelve month total (Footnote 2)	Fabric Filter Collector shall operate with a pressure drop range of 1.5 to 6.0 inches of water.	Approval #W221007 dated April 30, 2008. CAM Rule 40 CFR 64
		SO ₂	0.03 lb/MMBtu, 0.90 lb/hr, 3.9 tons per rolling twelve month total		
		NOx	0.22 lb/MMBtu, 6.6 lb/hr, 28.9 tons per rolling twelve month total		
		CO	0.45 lb/MMBtu, 13.5 lb/hr, 58.9 tons per rolling twelve month total		
		VOC	0.03 lb/MMBtu, 0.90 lb/hr, 3.9 tons per rolling twelve month total		
		Opacity	1. During normal operating times the opacity shall not exceed 5% at any time. 2. During start-up, shut down and soot blowing operations the opacity shall not exceed 20% for a period of two minutes in any one hour period and shall not exceed 40% at any time.		
2, 3, 4 & 5 combined				Combined steam generation shall not exceed 1,204,000 lb per day & 50,000 lb per hour Combined heat input into the four boilers shall not exceed 63,000,000 BTU/hour.	Approval #W221007 dated April 30, 2008.
		PM	27.6 tons per rolling twelve month total		
		SO ₂	290 tons per rolling twelve month total		
		NOx	102.1 tons per rolling twelve month total		
		CO	118.2 tons per rolling twelve month total		
		VOC	7.9 tons per rolling twelve month total		
Whole Facility	Pulp & Paper making chemicals, wastewater treatment fugitives and maintenance products	VOC	39.9 tons per rolling 12-month total		Approval #W002861 dated November 16, 1998

Footnote 1: Lb/hr limits for EU2 and 3 are for the two boilers combined.

Footnote 2: Lb/hr and tons per twelve month rolling total limits for EU4 and 5 are per boiler.

B. COMPLIANCE DEMONSTRATION

The permittee is subject to the monitoring/testing, record keeping, and reporting requirements as contained in Tables 4, 5, and 6 below and 310 CMR 7.00 Appendix C (9) and (10) and applicable requirements contained in Table 3:

Table 4	
EU#	MONITORING/TESTING REQUIREMENTS
2 and 3	1) The Permittee shall obtain and Maintain a shipping receipt from the fuel supplier for each shipment of oil delivered to demonstrate compliance with 310 CMR 7.05(1). The shipping receipt must certify that the shipment complies with the American Society for Testing and Materials (ASTM) specifications for residual No. 6 fuel oil. The Department may require testing of the residual No. 6 fuel oil if the shipping receipt does not clearly demonstrate compliance in accordance with 310 CMR 7.00: Appendix C(9)(b)2.
	2) The Permittee shall tune the emission units annually according to the procedure described in 310 CMR 7.19(6)(a)1.-12 in accordance with 310 CMR 7.19(6)(a).
	3) The Permittee shall at least once per month, verify that the settings determined during the tune-up have not changed in accordance with 310 CMR 7.19(6)(b)2.g.
	4) Compliance with the allowable smoke and opacity limits shall be determined in accordance with EPA Method 9 , as specified in 40 CFR 60, Appendix A in accordance with 310 CMR 7.00 Appendix C(9)(b).
	5) In accordance with 310 CMR 7.04(2)(a), maintain a smoke density indicator and recorder that is properly maintained in an accurate operating condition, operates continuously and is equipped with an audible alarm to signal the need for combustion equipment adjustment or repair when the smoke density is equal to or greater than No. 1 of the Chart.
	6) In accordance with 310 CMR 7.06(1)(c) and the Plan of Good Operating Practices, as a minimum, calibrate the smoke density indicator system at least annually in accordance with the manufacturer's recommended procedures.
	7) In accordance with 310 CMR 7.06(1)(c) and the Plan of Good Operating Practices, the smoke density indicator, audible alarm and recorder system is used as an indicator to initiate corrective actions if the opacity level is in excess of the expected level, as defined in the Plan of Good Operating Practices, for: normal operation, startup, shutdown, burner shutdown/change, or soot blowing.
	8) In accordance with the Plan of Good Operating Practices, if measured opacity exceeds an applicable emission limit, the facility shall evaluate the exceedance to determine cause and if the Plan of Good Operating Practices was being followed during the exceedance period. The reason(s) and any corrective action shall be documented in a logbook or other permanent record. If more than three (3) exceedances of a particular type (startup, shutdown, burner shutdown/change, or soot blowing) should occur within a six (6) month period for any reason, then at the next scheduled event of that type, a Method 9 Test shall be conducted, and the Plan of Good Operating Procedures should be revised if appropriate. Based upon the cause of exceedance, the Permittee may request waiver of the Method 9 Test requirement. Any request shall be in writing to the Department.
	9) In accordance with the Plan of Good Operating Practices, in the event a smoke density indicator and recorder is out-of-service for more than two business days while a boiler is operating and firing oil, then a Method 9 Test shall be conducted at least once per day during normal operations and once per day during any scheduled soot blowing, startup, burner shutdown/change and/or shutdown events until the day that the smoke density indicator and recorder is placed back in service.
	10) In accordance with 310 CMR 7.06(1)(c), and the Plan of Good Operating Procedures, the opacity levels during normal operation, soot blowing, startup, burner shutdown/change and shutdown, as applicable, shall be determined in accordance with 40 CFR Part 60,

	<p>Appendix A, Method 9 at least once every twelve months.</p> <p>11) The Permittee shall inspect and maintain the emission units in accordance with the manufacturers recommendations and tested for efficient operation at least once each calendar year in accordance with 310 CMR 7.04(4)(a), provided that if there is a conflict between the 310 CMR 7.19(6) tuneup procedure and the manufacturers recommendations, the 7.19(6) procedure shall be followed.</p> <p>12) In accordance with 310 CMR 7.02(7) and 310 CMR 7.02(3)(d), all required Emission Testing to demonstrate compliance with the Emission Limits specified in Table 3 shall be conducted in accordance with EPA approved reference test methods unless otherwise approved by EPA and the Department or unless otherwise specified and shall include test Methods 1 - 4 and for Particulate Matter (Method 5), Sulfur Dioxide (Method 6C), Nitrogen Oxides (Method 7E), Carbon Monoxide (Method 10), Gaseous Organic Compounds (Method 18), Total Gaseous Organic Concentration (Method 25A), Hydrogen Chloride (Method 26A), Metals (Method 29).</p>
2, 3, 4 & 5	13) The Permittee shall monitor the daily steam production and hourly heat input to demonstrate compliance with the Table 3 limitations in accordance with Approval #W221007.
5	<p>14) In accordance with Approval #W221007, the Permittee shall do the following requirements for emission testing.</p> <p>A. EMISSION COMPLIANCE TESTING –the Permittee shall conduct compliance testing at a date and time specified by MassDEP. The following pollutants shall be tested for compliance with the emission limits: Particulate Matter, Sulfur Dioxide, Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds and Opacity.</p> <p>B. TESTING PROCEDURES - Emission Testing to demonstrate compliance with the Emission Limits specified shall be in accordance with EPA approved reference test methods unless otherwise approved by EPA or the Department. The facility will be constructed to accommodate emission-testing requirements contained herein. All emission testing shall be conducted in accordance with the Department's "Guidelines for Source Emission Testing" and in accordance with the Environmental Protection Agency tests as specified in the Code of Federal Regulations Title 40, Part 60, Appendix A...Standards of Performance for New Stationary Sources of Air Pollution.</p> <p>C. FUEL SUPPLY TESTING - During emission testing, the Permittee, under the Department's observations, shall obtain five random grab samples of wood fuel from the fuel stream and send the samples to a laboratory acceptable to the Department. The wood fuel shall be analyzed for the presence of contaminants inconsistent with the wood fuel definition, including but not limited to such materials as oils, paint, metals, plastics, or other foreign materials other than wood. BTU value, moisture content and Sulfur content shall also be tested for. The Permittee shall pay all laboratory expenses.</p> <p>D. PRETEST PROTOCOL - The Permittee shall submit a pre-test protocol, describing the test methods for the emissions testing and fuel supply testing. The protocol shall also include the sampling point locations, sampling equipment and sampling and analytical procedures as well as expected boiler operating conditions during the testing. The Permittee shall also propose a parametric monitoring strategy to ensure continuous compliance with the emission limitations specified in this approval. The required testing must be submitted to this Office, attention Bureau of Waste Prevention Section Chief, for review and Department approval at least 30 days prior to the commencement of emission testing at the facility.</p> <p>E. FINAL REPORT - The final test report must be submitted within sixty days of completion to the Department of Environmental Protection, Bureau of Waste Prevention, Permitting Section, 627 Main Street, Worcester, Massachusetts, 01608.</p>
4 & 5	<p>15) In accordance with Approval #W221007, the Permittee shall install, calibrate and maintain a smoke density indicator and recorder equipped with an audible alarm to measure opacity on EU #4 & 5.</p> <p>16) In accordance with Approval #W221007, the Permittee shall equip EU #4 & 5 with a steam flow meter and recorder.</p>

	<p>17) In accordance with Approval #W221007, the Permittee shall conduct Periodic Monitoring for the criteria pollutants as follows:</p> <p>PM: In accordance with CAM requirements: Quarterly black light test on baghouse. Daily monitoring of the smoke indicator/recorder, and the pressure drop across the baghouse.</p> <p>SO₂: Annually and upon change in fuel stock or supplier, sample the wood fuel for sulfur content.</p> <p>NO_x: Annually monitor the FGR fan settings.</p> <p>NO_x, CO, and VOC: Annual emission test (After initial compliance testing the Permittee may propose an alternative method of monitoring for NO_x, CO and VOC in lieu of an annual test).</p>
Facility Wide	18) The Permittee shall monitor the use of VOC-containing products to ensure that the Table 3 VOC limit is not exceeded, in accordance with Approval #W002861.
	19) The Permittee shall monitor the operations of the entire facility such that necessary information is available for the preparation of the annual Source Registration/Emission Statement Forms as required by 310 CMR 7.12.
	20) The Permittee shall conduct stack testing when the Department has determined that such stack testing is necessary to ascertain compliance with the Department's regulations or design approval provisos. Such stack testing shall be:
	<p>(a) conducted by a person knowledgeable in stack testing, and</p> <p>(b) conducted in accordance with procedures contained in a test protocol which has been approved by the Department, and</p> <p>(c) in the presence of a representative of the Department when such is deemed necessary; in accordance with 310 CMR 7.13(1).</p>

Table 5	
EU#	RECORD KEEPING REQUIREMENTS
2 and 3	<p>1) The Permittee shall maintain on site the following records for five (5) years from the date of generation and have the records readily available to the Department and EPA personnel in accordance with 310 CMR 7.00 Appendix C(10)(b):</p> <p>a) Fuel purchase receipts in order to demonstrate compliance with sulfur content requirements as provided in 310 CMR 7.05(1);</p> <p>b) All fuel-oil analyses completed on behalf of the Permittee;</p> <p>c) Inspection, maintenance, and testing results of the emission unit and the date upon which it was performed in accordance with 310 CMR 7.04(4)(a);</p> <p>d) Records of the date of tune-up; person(s) conducting tune up; O₂/CO (for gas) or O₂/smoke spot (for oil) correlations obtained during tune-up; boiler/burner manufacturer's recommended set-points; final boiler set-points as result of tune-up; normal boiler/burner maintenance records; and verification that the settings determined during the tune-up have not changed in accordance with 310 CMR 7.19(6)(b)2;</p> <p>e) records of emissions testing conducted to demonstrate compliance with the applicable requirements in Table 3 in accordance with 310 CMR 7.13(1)(d).</p> <p>f) daily steam flow charts to demonstrate compliance with the Table 3 facility wide steam load limitation, in accordance with Approval #W221007.</p> <p>g) records of soot blowing in accordance with Approval #C-B-90-011.</p> <p>2) In accordance with 310 CMR 7.06(1)(c), maintain records of the information specified in Table B of the POGOP. The calendar date for each record shall be clearly identified on the record.</p>

	<p>3) In accordance with 310 CMR 7.06(1)(c) and the POGOP, maintain smoke density indicator recorder records.</p> <p>4) In accordance with 310 CMR 7.06(1)(c) and the POGOP, maintain all 40 CFR 60 Appendix A Method 9 records.</p> <p>5) In accordance with 310 CMR 7.06(1)(c) and the POGOP, maintain a copy of the Plan of Good Operating Practices approved by the Department.</p> <p>6) In accordance with 310 CMR 7.06(1)(c), maintain a logbook or other permanent record that identifies the calendar date, start time, and end time for all smoke density indicator system calibrations.</p> <p>7) In accordance with 310 CMR 7.06(1)(c), maintain a logbook or other permanent record that identifies the calendar date, start time, and end time for any period of malfunction of the smoke density indicator, recorder and alarm system.</p> <p>8) In accordance with 310 CMR 7.06(1)(c), maintain a logbook or other permanent record that identifies the calendar date, start time, and end time for each startup, shutdown, burner shutdown/change and soot blow.</p> <p>9) In accordance with 310 CMR 7.06(1)(c), maintain a logbook or other permanent record that identifies the calendar date, start time, end time and a description of all maintenance performed on the smoke density indicator, recorder and audible alarm system.</p> <p>10) In accordance with 310 CMR 7.06(1)(c), maintain a logbook or other permanent record that identifies the calendar date, start time, end time and a description of the operating conditions for each event when the smoke density indicator, recorder and alarm system or Method 9 observations identifies that the opacity exceeded the level for the specific operating condition identified in Table A of the POGOP.</p> <p>11) In accordance with 310 CMR 7.06(1)(c), maintain a copy of the certification of the qualified observer for each 40 CFR 60, Appendix A, Method 9 observation.</p>
2, 3, 4 and 5	<p>In accordance with Approval #W221007 the Permittee shall keep the following records:</p> <p>A. The Permittee shall maintain an on-site record keeping system for each of the emission units. All records shall be maintained up-to-date such that year-to-date information is readily available for Department examination. The Permittee shall keep records for five years. The record keeping requirements apply to EU #2, #3, #4 and #5. Record keeping shall, at a minimum, include:</p> <ol style="list-style-type: none"> 1. On site the operating and maintenance procedures for the emission units. 2. Operating and Maintenance log books, (these log books shall contain the following information on a daily basis: <ol style="list-style-type: none"> i) Date and hours of operation of the boilers ii) Date, time and description of any maintenance performed on the boilers, monitoring systems, breeching or stack. iii) Smoke recorder charts 3. Fuel inventory including the total amount of wood-fuel and oil on a monthly basis and 12 month rolling total. 4. Name of Company delivering the wood-fuel and oil including as a minimum, date of delivery, amount of tons/gallons, sulfur content of fuel oil and truck ID number. <p>B. The Permittee shall maintain steam flow charts for the fuel utilization facility to demonstrate compliance with the facility wide steam load limitations.</p> <p>C. Fuel inventory, total amount of wood-fuel and oil on site on a daily basis.</p> <p>D. Fluorescent black light test results from the bag house and routine maintenance.</p> <p>E. Upon completion of any fluorescent black light test, facility personnel shall maintain the following records:</p> <ol style="list-style-type: none"> i) The date the test was performed; ii) Name of person or consultant performing the test; iii) List any deficiencies on the bag house operational parameters and test results. <p>F. Records of other Table 4.(17) Periodic Monitoring items including baghouse pressure drop, opacity charts, wood sulfur content, FGR percent damper open, and annual emission test results.</p>

Facility Wide	1) The Permittee shall maintain sufficient records to demonstrate that VOC emissions have not exceeded the permit limit, including but not limited to daily production records, raw material usage rates and VOC emission calculations, in accordance with Approval #W002861.
	2) The Permittee shall maintain sufficient records of its operations and monitoring information for the annual preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12.
	3) The Permittee shall keep copies of Source Registration/Emission Statement Forms and other information submitted to the Department for five years as required per 310 CMR 7.12(3)(b).

Table 6	
EU#	REPORTING REQUIREMENTS
2, 3	1) The Permittee shall submit fuel-oil sulfur content test results , obtained from the fuel supplier and or requisite analyses, to the Department upon request, as provided for in 310 CMR 7.05(1).
	2) In accordance with 310 CMR 7.06(1)(c), notify the Department, in writing, of any 40 CFR 60, Appendix A, Method 9 test results that indicates the percent opacity to be in excess of that defined in Table A of the POGOP. The notice shall be given within one business day. Within three business days the Permittee shall submit: a copy of the Method 9 data sheet(s), copy of smoke density indicator records, an explanation for the elevated opacity, and any proposed revisions to the Plan of Good Operating Practices which will be implemented so as to prevent a recurrence of said exceedance in the future.
Facility Wide	3) In accordance with 310 CMR 7.13(1) and 7.13(2), if determined by the Department that stack testing is necessary to ascertain compliance with the Department's regulations or design approval provisos shall cause such stack testing to be summarized and submitted to the Department as prescribed in the agreed to pretest protocol.
	4) Upon the Department's request, any records required by the applicable requirements identified in Sections 4 and 5 of the operating permit, or the emissions of any air contaminant from the facility, shall be submitted to the Department within 30 days of the request by the Department, or within a longer time period if approved in writing by the Department. Said response shall be transmitted on paper, on computer disk, or electronically at the discretion of the Department, pursuant to 310 CMR 7.00 Appendix C(10)(a) incorporated herein by reference.
	5) The Permittee shall submit a Source Registration/Emission Statement form to the Department on an annual basis as required by 310 CMR 7.12.
	6) The Permittee shall submit by January 30 and July 30 for the previous six months respectively, a summary of all monitoring data and related supporting information to the Department as required by 310 CMR 7.00: Appendix C(10)(c).
	7) All required reports must be certified by a responsible official of the Permittee as provided in 310 CMR 7.00: Appendix C(10)(h).

C. GENERAL APPLICABLE REQUIREMENTS

The permittee shall comply with all generally applicable requirements contained in 310 CMR 7.00 et. seq. and 310 CMR 8.00 et. seq., when subject.

D. REQUIREMENTS NOT CURRENTLY APPLICABLE

The permittee is currently not subject to the following requirements:

Table 7	
REGULATION	DESCRIPTION/REASON
Reduction of Single Occupant Commuter Vehicle Use 310 CMR 7.16	Permittee has less than 250 employees.
Prevention of Accidental Release 42 USC 7401, s. 112(r)	Storage, usage and processing of listed chemicals below the applicable thresholds.
Stratospheric Ozone 42 USC 7401, Title VI	No such applicable activities conducted at the facility.

5. SPECIAL TERMS AND CONDITIONS

In accordance with Approval #W221007, the permittee is subject to the following special provisions that are not contained in Table 3, 4, 5, and 6:

A. The emissions from EU #2 and EU#3 combustion units will be emitted through an existing steel stack. The emissions from the new units EU#4 and #5 will be emitted through a new steel exhaust stack. Specifications on the exhaust stacks are presented in Table 8.

Table 8 –Stack Information					
Emission Unit Number	Stack Material	Stack Diameter	Stack Height	Stack Velocity	Stack Exit Temperature
EU #2 & #3	Steel	4.5 feet	140 feet	20-40 feet/sec	425-550°F
EU #4 & 5	Steel	3.33 feet	100 feet	33 feet/sec	325 - 425°F

B. The Permittee shall only burn wood fuel in EU#4 & #5 at this time. The Permittee is not precluded from requesting approval to burn other biomass materials at a future date. Such request shall be made in writing to the Department. Depending on the nature of the request a plan application in accordance with the air pollution control regulations at 310 CMR 7.02 and/or Operating Permit modification in accordance with 310 CMR 7.00 Appendix C(8) may or may not be required.

C. The Permittee shall only burn “wood-fuel” that meets the definition in the Air Pollution Control Regulations at 310 CMR 7.00. The noted definition states “Wood-Fuel means all wood intended to be used as a fuel included but not limited to trees, cord wood, logs, lumber, sawdust, and wood from manufacturing processes (but offs, shavings, turnings, sawdust, etc.), wood pallets, slabs, bark, chips, waste pallets, boxes,

etc. This definition does not include materials, which are chemically treated with any preservative, paint, or oil.” Please note that it does not include wood waste derived from Construction and Demolition debris. Any deviation from the wood fuel noted herein will require the Permittee to submit additional information for evaluation by DEP. Written approval from the Department is required prior to use of wood fuel that does not conform to the definition noted herein or the air pollution control regulations.

D. The Permittee shall ensure that the delivery of any wood fuel shall be done in covered leak proof trailers.

E. Boiler bottom ash will be discharged into a rolling container inside the boiler house. The fly ash drops through double gate valves from the fabric filter into barrels.

F. The Permittee shall develop and implement a plan to monitor the ash collection system. The Permittee shall take appropriate action to prevent at all times, the release to the ambient air of visible emissions that exceed 0% opacity because of the handling of the ash. Ash that may be spilled on the ground shall be promptly removed in a manner that does not cause a condition of air pollution.

G. In accordance with Department Noise Policy 90-001 the Permittee shall not allow the facility to produce an increase in sound by more than 10dBA over the existing L90 ambient level (1-hour A-weighted), unless otherwise specified. Additionally, pure tone sounds, defined, as any octave band level, which exceeds the levels in adjacent octave bands by 3dBA or more, is prohibited. (State only)

H. The Permittee shall install and have operational noise suppressants (muffler) on all steam release vents so that sound emissions from the boiler will not cause or contribute to a condition of air pollution. (State only)

I. The Permittee is subject to the requirements of 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial - Commercial Steam Generating Units.

6. ALTERNATIVE OPERATING SCENARIOS

The permittee did not request alternative operating scenarios in its operating permit application.

7. EMISSIONS TRADING

(a) Intra-facility emission trading

The facility did not request intra-facility emissions trading in its operating permit application.

Pursuant to 310 CMR 7.00: Appendix C(7)(b), emission trades, provided for in this permit, may be implemented provided the Permittee notifies The United States Environmental Protection Agency (EPA) and the Department at least fifteen (15) days in advance of the proposed changes and the Permittee provides the information required in 310 CMR 7.00: Appendix C(7)(b)3.

Any intra-facility change that does not qualify pursuant to 310 CMR 7.00: Appendix C(7)(b)2 is required to be submitted to the Department pursuant to 310 CMR 7.00: Appendix B.

(b) Inter-facility emission trading

The Permittee did not request inter-facility emissions trading in its operating permit application.

All increases in emissions due to emission trading, must be authorized under the applicable requirements of 310 CMR 7.00: Appendix B (the "Emissions Trading Program") and the 42 U.S.C. §7401 et seq. (the "Act"), and provided for in this permit.

8. COMPLIANCE SCHEDULE

The Permittee has indicated that the facility is in compliance and shall remain in compliance with the applicable requirements contained in Sections 4 and 5.

In addition, the Permittee shall comply with any applicable requirements that become effective during the permit term.

GENERAL CONDITIONS FOR OPERATING PERMIT

9. FEES

The permittee has paid the permit application processing fee and shall pay the annual compliance fee in accordance with the fee schedule pursuant to 310 CMR 4.00.

10. COMPLIANCE CERTIFICATION

All documents submitted to the Department shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in compliance with 310 CMR 7.01(2) and contain the following language:

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment."

The "Operating Permit Reporting Kit" contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring Summary Report and Certification. The "Operating Permit Reporting Kit" is available to the Permittee via the Department's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

(a) Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 to the Department and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
- iv. any additional information required by the Department to determine the compliance status of the source.

(b) Semi-Annual Monitoring Summary Report and Certification

The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 and July 30 to the Department. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;
- iv. whether there were any deviations during the reporting period;
- v. if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
- vi. whether deviations in the reporting period were previously reported;
- vii. if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
- viii. if the deviations in the reporting period have returned to compliance and date of such return to compliance; and
- ix. any additional information required by the Department to determine the compliance status of the source.

11. NONCOMPLIANCE

Any noncompliance with a permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the Department and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This permit does not relieve the permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this permit.

12. PERMIT SHIELD

(a) This facility has a permit shield provided that it operates in compliance with the terms and conditions of this permit. Compliance with the terms and conditions of this permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7, for the emission units as described in the permittee's application and as identified in this permit.

Where there is a conflict between the terms and conditions of this permit and any earlier approval or permit, the terms and conditions of this permit control.

(b) The Department has determined that the permittee is not currently subject to the requirements listed in Section 4, Table 7.

(c) Nothing in this permit shall alter or affect the following:

- (i) the liability of the source for any violation of applicable requirements prior to or at the time of permit issuance.
- (ii) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401,

§408(a); or

(iii) the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Act.

13. ENFORCEMENT

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22, 7.70 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A.

All other terms and conditions contained in this permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the Department, EPA and citizens as defined under the Act.

A Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

14. PERMIT TERM

This permit shall expire on the date specified on the cover page of this permit, which shall not be later than the date 5 years after issuance of this permit.

Permit expiration terminates the permittee's right to operate the facility's emission units, control equipment or associated equipment covered by this permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

15. PERMIT RENEWAL

Upon the Department's receipt of a complete and timely application for renewal, this facility may continue to operate subject to final action by the Department on the renewal application.

In the event the Department has not taken final action on the operating permit renewal application prior to this permit's expiration date, this permit shall remain in effect until the Department takes final action on the renewal application, provided that a timely and complete renewal application has been submitted in accordance with 310 CMR 7.00: Appendix C(13).

16. REOPENING FOR CAUSE

This permit may be modified, revoked, reopened, and reissued, or terminated for cause by the Department and/or EPA. The responsible official of the facility may request that the Department terminate the facility's operating permit for cause. The Department will reopen and amend this permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C(14).

The filing of a request by the permittee for an operating permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any operating permit condition.

17. DUTY TO PROVIDE INFORMATION

Upon the Department's written request, the permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall furnish to the Department copies of records that the permittee is required to retain by this permit.

18. DUTY TO SUPPLEMENT

The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a complete renewal application was submitted but prior to release of a draft permit.

The permittee shall promptly, on discovery, report to the Department a material error or omission in any records, reports, plans, or other documents previously provided to the Department.

19. TRANSFER OF OWNERSHIP OR OPERATION

This permit is not transferable by the permittee unless done in accordance with 310 CMR 7.00: Appendix C(8)(a). A change in ownership or operation control is considered an administrative permit amendment if no other change in the permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between current and new permittee, has been submitted to the Department.

20. PROPERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.

21. INSPECTION AND ENTRY

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Department, and EPA to perform the following:

- (a) enter upon the permittee's premises where an operating permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the operating permit or applicable requirements as per 310 CMR 7.00 Appendix C(3)(g)(12).

22. PERMIT AVAILABILITY

The permittee shall have available at the facility, at all times, a copy of the materials listed under 310 CMR 7.00: Appendix C(10)(e) and shall provide a copy of the permit, including any amendments or attachments thereto, upon request by the Department or EPA.

23. SEVERABILITY CLAUSE

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

24. EMERGENCY CONDITIONS

The permittee shall be shielded from enforcement action brought for noncompliance with technology based¹ emission limitations specified in this permit as a result of an emergency². In order to use emergency as an affirmative defense to an action brought for noncompliance, the permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (a) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- (b) the permitted facility was at the time being properly operated;
- (c) during the period of the emergency, the permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and
- (d) the permittee submitted notice of the emergency to the Department within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response immediate notification to the appropriate parties should be made as required by law.

25. PERMIT DEVIATION

Deviations are instances where any permit condition is violated and not reported as an emergency pursuant to section 24 of this permit. Reporting a permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements listed in Table 6. of this Operating Permit shall supercede the following deviation reporting requirements, if applicable.

The Permittee shall report to the Department's Regional Bureau of Waste Prevention the following deviations from permit requirements, by telephone or fax, within three (3) days of discovery of such deviation:

- Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent

¹ Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

² An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

(10%) or more above the emission limit.

- Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the permit or approval as surrogate for an emission limit.
- Exceedances of permit operational limitations directly correlated to excess emissions.
- Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the Massachusetts Department of Environmental Protection Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available to the Permittee via the Department's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

This report shall include the deviation, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone or fax within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the permit and in compliance with all applicable requirements provided the permittee gives the EPA and the Department written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(h) and (i). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C(7)(a) and will be appended to the facility's permit. The permit shield allowed for at 310 CMR 7.00: Appendix C(12) shall not apply to these changes.

27. MODIFICATIONS

(a) Administrative Amendments - The permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).

(b) Minor Modifications - The permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d).

(c) Significant Modifications - The permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(c).

(d) No permit revision shall be required, under any approved economic incentives program, marketable permits program, emission trading program and other similar programs or processes, for changes that are provided in this operating permit. A revision to the permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the

Act, provided that such increases do not require an operating permit revision under any other applicable requirement.

APPEAL CONDITIONS FOR OPERATING PERMIT

This permit is an action of the Department. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C(6), with respect to the Department's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the facility must continue to comply with all existing federal and state applicable requirements to which the facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the facility shall not be in violation of the Act for operating without a permit.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the permit is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to The Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

The Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency) county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

28. LEGEND OF ABBREVIATED TERMS IN OPERATING PERMIT

*Not all abbreviations are present in every Operating Permit

< - Less Than
> - Greater Than
#/hr - Pounds Per Hour
10⁶ BTU/hr - 1,000,000 BTU Per Hour
AQCR - Air Quality Control Region
CEM - Continuous Emission Monitor
CO - Carbon Monoxide
EPA - Environmental Protection Agency
FGR – Flue Gas Recirculation
FMF FAC. NO. - Facility Master File Number
FMF RO NO. - Facility Master File Regulated Object Number
FT³/day - Cubic Feet Per Day
HAP – Hazardous Air Pollutant
HHV - Higher Heating Value
ISO – Represent 59° F, 60% Relative Humidity, 29.92 Inches Mercury At Sea Level
MADEP - Massachusetts Department of Environmental Protection
MMBTU/hr - Million British Thermal Units Per Hour
NH₃ - Ammonia
NO_x - Nitrogen Oxides
PB - Lead
PLT ID - Plant Identification
PM - Particulate Matter
PPM - Parts Per Million
PTE - Potential To Emit
SO₂ - Sulfur Dioxide
SSEIS - Stationary Source Emission Inventory System
TPY - Tons Per Year
VOC - Volatile Organic Compound
POGOP – Plan of Good Operating Practices